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MEMO ENDORSED

June 11, 2021

6/22/21

Extension granted

Honorable Colleen McMahon
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: United States v. Sabitry and Gary Laforest,
21 Cr. 272(CM)

Colleen McMahon

Dear Judge McMahon:

I write on behalf of my client Gary Laforest and his wife and co-defendant Sabitry Laforest for a second extension of two weeks until June 25th to satisfy the bail conditions set by the court. I previously wrote to your Honor and requested an extension to fulfill the conditions by today.

To date one person signed the bond and two potential co-signers will be interviewed by the government shortly. The affidavit for the confession of judgment should be notarized today and a family member of the defendants will file that in Queens County next week.

Assistant U.S. Attorney Matthew Shahabian advised that he has no objection to this request.

Thank you for your consideration of this request.

Respectfully yours,
/s/
Thomas F.X. Dunn

Cc: Matthew Shahabian, Esq.
Assistant U.S. Attorney (by ECF)

Donna Newman, Esq.
(by ECF)

